

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 5,431,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference.
- Defendants have produced approximately 2,167,000 documents and over 55.8 billion observations of data covering 8 different countries in this litigation to date.

Pursuant to the Court's instruction at the March 13, 2025 conference, Defendants further submit the following metric regarding Defendants' ongoing privilege review workflow.

- As of today, there are zero documents in Defendants' privilege review workflow that have not yet produced or logged.

In light of Defendants' completion of their custodial document review and custodial document productions, Defendants respectfully request that the Court discontinue the requirement for bi-weekly discovery status updates. Plaintiffs do not oppose this request.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: July 18, 2025

Respectfully submitted,

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cc: All Counsel of Record (via ECF)